

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 17-11140 CMB
	:	
LINDA JOAN TROHOSKE,	:	
Debtor,	:	HON. CARLOTA M. BÖHM
	:	
FIFTH THIRD BANK,	:	
Movant,	:	CHAPTER 13
	:	
v.	:	RELATED TO CLAIM NO. 1-2
	:	
LINDA JOAN TROHOSKE; and	:	
RONDA J. WINNECOUR, ESQUIRE,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE
FILED IN COMPLIANCE WITH THE LOCAL RULES

I hereby certify as counsel for the Debtor that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully Submitted,
THE QUINN LAW FIRM

BY: /s/ Michael S. Jan Janin
Michael S. Jan Janin, Esquire
PA Id. No. 38880
2222 West Grandview Boulevard
Erie, Pennsylvania 16506-4508
Phone: (814) 833-2222, Ext. 1045
Facsimile: 814-833-6753
mjanjanin@quinnfirm.com
Counsel for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: : BANKRUPTCY NO. 17-11140 CMB
:
LINDA JOAN TROHOSKE, :
Debtor, : HON. CARLOTA M. BÖHM
:
FIFTH THIRD BANK, :
Movant, : CHAPTER 13
:
v. : RELATED TO CLAIM NO. 1-2
:
LINDA JOAN TROHOSKE; and :
RONDA J. WINNECOUR, ESQUIRE, :
CHAPTER 13 TRUSTEE, :
Respondents. :

**CERTIFICATE OF SERVICE OF DECLARATION REGARDING
NOTICE OF MORTGAGE PAYMENT CHANGE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on December 8, 2022.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: CM/ECF Notification System.

- Office of the United States Trustee at ustpreregion03.pi.ecf@usdoj.gov
- Ronda J. Winnecour at cmecf@chapter13trusteedpa.com
- Marisa Myers Cohen on behalf of Creditor Fifth Third Bank, N.A. at mcohen@mwclaw.com
- Stephen Russell Franks on behalf of Creditor Fifth Third Bank, N.A. at amps@manleydeas.com
- Alexandra Teresa Garcia on behalf of Creditor MB Financial Bank, National Association at ecfmail@mwclaw.com
- Andrew M. Lubin on behalf of Creditor Fifth Third Bank, N.A. at alubin@milsteadlaw.com,
- Brian Nicholas on behalf of Creditor MB Financial Bank, National Association at bnicholas@kmlawgroup.com
- Thomas Song on behalf of Creditor MB Financial Bank, National Association at pawb@fedphe.com

EXECUTED ON: December 8, 2022

Respectfully Submitted,
THE QUINN LAW FIRM

BY: /s/ Michael S. Jan Janin

Michael S. Jan Janin, Esquire
PA Id. No. 38880
2222 West Grandview Boulevard
Erie, Pennsylvania 16506-4508
Phone: (814) 833-2222, Ext. 1045
Facsimile: 814-833-6753
mjanjanin@quinnfirm.com
Counsel for Debtor